

OSBORN LAW P.C.

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December 3, 2021

VIA ECF

Honorable Debra Freeman
United States Magistrate Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: *Vanderhorst v. Commissioner of Social Security*,
Civil Action No. 1:20-cv-09921-DCF

Dear Judge Freeman,

We write on behalf of plaintiff, Julia Vanderhorst on behalf of Minor Child SJAV, and with the consent of the defendant, to request a 45-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion currently is due on December 10, 2021. Plaintiff respectfully requests an extension of time up to and including January 24, 2022. This is plaintiff's second request for an extension. The request is necessitated by the number of briefs due to be filed by our office within the next two weeks.

Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. Plaintiff to file her motion for judgment on the pleadings on or before **January 24, 2022**;
- b. Defendant to file its response/cross-motion on or before **March 25, 2022**; and

The proposed modification to the briefing schedule is adopted.

SO ORDERED


DEBRA FREEMAN
United States Magistrate Judge

Dated: 12/4/2021

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c. Plaintiff to serve her reply (if any) on or before **April 15, 2022**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Shira Siskind, Esq. (by ECF)